

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

John D. West, on Behalf Of Himself and All	)	
Other Persons Similarly Situated,	)	
214 Woodlawn Road, Butler, Pennsylvania	)	
	)	
Plaintiffs,	)	
v.	)	
	)	Case No.: C-1-02-0001
AK Steel Corporation (Formerly ARMCO Inc.)	)	
Retirement Accumulation Pension Plan, a part	)	
of the AK Steel Corporation (Formerly	)	
ARMCO Inc.) Noncontributory Pension Plan,	)	
703 Curtis Street, Middletown, Ohio 45043	)	Judge: Hon. Sandra S. Beckwith
	)	
and	)	
	)	
AK Steel Corporation Benefit Plans	)	Magistrate Judge: Timothy S. Black
Administrative Committee,	)	
703 Curtis Street, Middletown, Ohio 45043	)	
	)	
Defendants.	)	
	)	

## SUPPLEMENTAL DECLARATION OF HEATHER SANDERS

I, Heather Sanders, hereby declare as follows:

1. I am employed by Employee Benefit Data Services Co. ("EBDS") as a Pension Administrator. I have been employed by EBDS since 1996. EBDS, performs certain services for the AK Steel Corporation Retirement Accumulation Pension Plan ("RAPP"), and has done so since January 1995. In my capacity with EBDS I have been assigned to work on the RAPP account continuously since 1999.

2. EBDS maintains a computer database, referred to as the RAPP maintenance system, which contains personal information on each RAPP participant, as well the amount of each participant's opening and future accounts, and the amount and type of any

distribution elected by RAPP participants. My duties with respect to the RAPP include, among other things, updating the RAPP maintenance system to reflect personal data on RAPP participants, processing interest and pay credits in opening and future accounts, and updating the system to reflect distributions.

3. When an AK Steel employee becomes a RAPP participant EBDS receives a computer file from AK Steel or manual data from the plant administrators containing that participant's personal information which includes, among others things, the participant's name, date of birth, and date of hire. We subsequently receive from AK Steel monthly updates reflecting pensionable earnings for each RAPP participant. This data is uploaded into the RAPP maintenance system, which then automatically calculates pay credits for each participant. On a quarterly basis each participant's opening and future account balances are also updated to reflect interest credits, based on the interest rates supplied to EBDS by AK Steel. My understanding is that AK Steel receives these interest rates from the RAPP actuaries.

4. When a RAPP participant elects to receive a lump sum distribution we are notified of such an election by AK Steel. Upon receiving such notice we then confirm for AK Steel the participant's name, opening and future account balances, and lump sum amount as of the expected distribution date. Once the distribution is approved by AK Steel, EBDS then proceeds to prepare the distribution via a check payable to the RAPP participant for this amount. Once a distribution has been made, the RAPP maintenance system is updated to reflect the date and amount of the distribution.

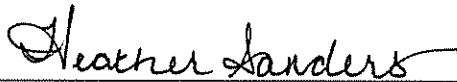
5. In connection with the above-captioned litigation, EBDS received several requests from the RAPP actuaries during 2004 and 2005 to provide the following information with respect to RAPP participants who received lump sums payments on or after January 1,

1995: name, date of birth, amount of lump sum payment, date of lump sum payment, opening account balance at time of lump sum payment, and future account balance at time of lump sum payment. In response to these requests EBDS technical personnel performed a computer search of the RAPP maintenance system to identify all RAPP participants who received whole or partial lump sum payments. The requested information for each such participant was then forwarded to the RAPP actuaries.

6. To the best of my knowledge, information, and belief, the information provided by EBDS to the RAPP actuaries included all of the RAPP participants who retired or were terminated from employment on or after January 1, 1995, and who received their pension benefits under the RAPP in the lump sum form of payment on or before February 1, 2005.

Pursuant to 28 U.S.C. § 1746, I swear under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge and belief.

Date: 5/26/05

  
Heather Sanders